Exhibit A

Case 4:22-cv-03359 Document 85-1 Filed on 08/08/23 in TXSD Page 2 of 24 Hays Financial Consulting, LLC

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 4/1/2023 to 6/30/2023

July 14, 2023

Professional Services

	Hours	Amount
Accounting	1.70	469.20
Asset Analysis & Recovery	7.70	2,055.40
Asset Disposition	1.00	293.20
Business Analysis	67.40	17,272.40
Case Administration	20.00	6,483.20
Claims Administration & Objections	0.80	289.60
Data Analysis	24.60	6,440.20
Fee / Employment Applications & Objection	5.20	NO CHARGE
Forensic Accounting	193.00	53,279.60
Litigation Consulting	74.20	21,055.40
Status Reports	16.10	5,535.80
For professional services rendered	411.70	\$113,174.00
Additional Charges :		
Pacer Charges		113.36
Total costs		\$113.36
Total amount of this bill	_	\$113,287.36

Case 4:22-cv-03359 Document 85-1 Filed on 08/08/23 in TXSD Page 3 of 24 Hays Financial Consulting, LLC

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 4/1/2023 to 6/30/2023

July 14, 2023

Professional Services

_ <u>H</u> i	rs/Rate	Amount
Dwaine A. Butler	92.90	15,793.00
170	0.00/hr	
	126.40	45,575.80
360	0.57/hr	
Scott S. Askue	192.40	51,805.20
	9.26/hr	
For professional services rendered	411.70	\$113,174.00
Additional Charges :		
Pacer Charges		113.36
Total costs		\$113.36
Total amount of this bill	_	\$113,287.36

Case 4:22-cv-03359 Document 85-1 Filed on 08/08/23 in TXSD Page 4 of 24 Hays Financial Consulting, LLC

2964 Peachtree Road Suite 555 Atlanta, GA 30305-2153

SEC v CryptoFX John Lewis, Receiver

For the Period from 4/1/2023 to 6/30/2023

July 14, 2023

Professional Services

		Hrs/Rate	Amount
Acc	counting		
4/5/2023 SSA	Drafted email to Lisa Ferm regarding banking ledgers.	0.10	27.60
4/10/2023 SSA	Reviewed prior quarter banking activity. Prepared Standardized Funds Accounting Report for first quarter 2023.	276.00/hr 1.60 276.00/hr	441.60
	Subtotal	1.70	469.20
Ass	set Analysis & Recovery		
5/23/2023 SSA	Reviewed for available information on Hair News Color N Cuts LLC.	0.20 276.00/hr	55.20
6/21/2023 SGH	Reviewed the updated liquidation analysis and pending recovery matters.	0.40 362.00/hr	144.80
SSA		2.30 276.00/hr	634.80
6/22/2023 SGH	Reviewed information on possible claims against PLS. Reviewed prior emails. Drafted email to John Lewis and Caroline Gieser. Researched information on the \$4.7 million in cashier's checks.	0.90 362.00/hr	325.80
SGH	Additional research and email to receiver regarding PLS possible claims.	0.60 362.00/hr	217.20
SSA	Updated recovery analysis.	0.20 276.00/hr	55.20
SSA	Reviewed issues and value of money order transactions. Drafted email to the Receiver regarding same.	0.30 276.00/hr	82.80
6/23/2023 SSA		0.60 276.00/hr	165.60
DAB	Reviewed and responded to several emails from Greg Hays regarding PLS matter and money order research. Reviewed several notices regarding fraudulent money order conveyances for Receiver's report. Continued to research for language to add to report.	1.40 170.00/hr	238.00
6/27/2023 DAB	Relativity research regarding potential PLS money order claim. Discussed issues with Greg Hays regarding open case issues and research of wallet address detail.	0.80 170.00/hr	136.00

,		Hrs/Rate	Amount
	Subtotal	7.70	2,055.40
Ass	set Disposition		
4/4/2023 SSA	Drafted email to James Daniels regarding administration of coins on nano drive. Drafted emails to Sonila Themeli regarding access to same.	0.40 276.00/hr	110.40
5/9/2023 SGH	Reviewed appraisal and responded to email regarding sale of property.	0.20 362.00/hr	72.40
6/20/2023 SSA	Reviewed offer on Mack Washington property. Reviewed file and drafted email to Receiver Team regarding valuation of property and other issues for counter offer.	0.40 276.00/hr	110.40
	Subtotal	1.00	293.20
Bus	siness Analysis		
4/4/2023 SSA	Reviewed production by and researched for transactions by Los Angeles based leaders and investors. Complied same. Reviewed spreadsheet containing data and data in SalesForce.	4.40 276.00/hr	1,214.40
DAB	Continued research in Relativity of WhatsApp images and investor Bitcoin accounts. Reviewed communications and documents for leader accounts.	1.70 170.00/hr	289.00
SSA	Reviewed for leader Flor De Mara's involvement in sales.	2.20 276.00/hr	607.20
4/5/2023 DAB	Continued to review Relativity for documentation and leader revenue reports. Researched listing of investor names for the determination of transactions and insider transfers.	2.70 170.00/hr	459.00
4/6/2023 SGH		1.00 362.00/hr	362.00
4/10/2023 SGH	Reviewed email and draft email to Sonila Themeli regarding data on leaders and pursuing the leaders. Discussed same with Scott Askue.	0.40 362.00/hr	144.80
4/12/2023 DAB	Reviewed and responded to emails from Greg Hays and Scott Askue regarding research of John Fernandez and determination of involvement with Crypto operation. Reviewed Relativity for information regarding insider transactions and communications with investors. Reviewed several emails from James Daniels regarding Blocktrace transaction detail and related Coinbase account transactions. Researched Crypto report for specific transfer and insider dialogue information.	2.80 170.00/hr	476.00
4/13/2023 SSA	Researched for connection between John Fernandez and CFX and activity between same.	1.90 276.00/hr	524.40
4/14/2023 SSA	Researched for connection between Elite Generation and CryptoFX and importance to report.	0.50 276.00/hr	138.00
4/18/2023 SSA	Reviewed complaint filed by the SEC against John Fernandez and Elite Generators. Drafted summary of same. Researched for cash payments from CryptoFX to same.	0.70 276.00/hr	193.20

,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		Hrs/Rate	Amount
4/25/2023 DAB	Reviewed and responded to emails from Greg Hays and Scott Askue regarding review of leader spreadsheets and calculation of commissions and sales for Receiver report. Reviewed and responded to email from Mr. Hays. Adjusted and circulated leader report with wallet address information. Continued to researched 14Jw wallet address information and correspondence in Relativity. Updated leader schedule with information regarding wallet addresses.	2.80 170.00/hr	476.00
SSA	Reviewed for information available on leaders and their transactions. Drafted various emails regarding same.	3.30 276.00/hr	910.80
5/3/2023 SSA		1.20 276.00/hr	331.20
5/15/2023 SSA	Analyzed Gloria Castaneda leader spreadsheet for commissions earned, elite bono payments and investment returns, reinvestments and return of principal. Tested against Salesforce data.	4.20 276.00/hr	1,159.20
SSA		2.50 276.00/hr	690.00
5/16/2023 SSA	Compiled leader contracts for future use.	2.20 276.00/hr	607.20
5/18/2023 SSA	Set up data capturing template for payments to sales leaders.	1.80 276.00/hr	496.80
SSA	Prepared report of payments to Elizabeth Escoto based on 'leader' spreadsheet.	3.20 276.00/hr	883.20
5/19/2023 SSA	Continued review and analysis of leader payments and research based on Salesforce data and leader spreadsheet and Defendant records.	5.20 276.00/hr	1,435.20
5/23/2023 SSA	Continued researching leader issues and drafting of memo regarding data collection and issues with same.	4.40 276.00/hr	1,214.40
DAB	Reviewed Relativity portal for research of Elvia Chalco communications and correspondence. Reviewed investor list and researched Elvia Cecilia Chalco Llangara and related WhatsApp communications. Reviewed potential Bitcoin transactions and related leader investment information. Researched leader spreadsheets for information regarding investor transfers and communication with Bustos.	1.60 170.00/hr	272.00
5/24/2023 SGH	Reviewed analysis of leader transaction and memo by Scott Askue.	0.80 362.00/hr	289.60
SSA	Finalized memo on leader data and issues with same. Finalized analysis of payments to same leader.	3.60 276.00/hr	993.60
5/25/2023 SGH	Reviewed information regarding leader and reports prepare by Scott Askue to prepare for the call with SEC today. Considered issues regarding pursuing sales agents.	0.70 362.00/hr	253.40
5/26/2023 DAB	Reviewed emails from Sonila Themeli and Greg Hays regarding database of CFX leaders and employees. Researched employee detail and communication in Relativity in preparation of leader earnings analysis. Continued to research leader spreadsheets and specific wallet address detail.	1.40 170.00/hr	238.00

SEC v CryptoFX		Page	e 4
		Hrs/Rate	Amount
5/31/2023 DAB	Researched Relativity portal for leader spreadsheet information. Researched search from leader list and reviewed email communications for wallet transaction detail and accounting.	0.70 170.00/hr	119.00
6/1/2023 SSA		2.70 276.00/hr	745.20
6/7/2023 DAB	Researched Relativity for leader spreadsheets. Continued to review leader names in search of communications with investors and several wallet address designations.	1.20 170.00/hr	204.00
SSA	Prepared reports of earnings and commission earned by select leaders. Prepared contracts for same.	5.60 276.00/hr	1,545.60
	Subtotal	67.40	17,272.40
<u>Ca</u>	se Administration		
4/3/2023 SGH	Participated in the weekly Receiver Team conference call and discussed all pending matters including plans for next quarterly report and sales agent litigation.	1.00 362.00/hr	362.00
SSA		1.00 276.00/hr	276.00
4/4/2023 SGH		0.80 362.00/hr	289.60
4/14/2023 SGH		0.40 362.00/hr	144.80
4/17/2023 SSA	Weekly team meeting regarding upcoming matters and case strategy.	1.00 276.00/hr	276.00
4/26/2023 SGH		0.40 362.00/hr	144.80
5/1/2023 SGH		1.00 362.00/hr	362.00
SSA		0.50 276.00/hr	138.00
SSA		1.00 276.00/hr	276.00
5/15/2023 SGH		1.00 362.00/hr	362.00
SSA	Weekly meeting with Receiver team.	1.20 276.00/hr	331.20

Page 5 SEC v CryptoFX Hrs/Rate **Amount**

5/19/2023 SGH	Telephone call from Shaun MacGruder of Blocktrace (.1). Call to Sonila Themeli regarding Blocktrace Report and fee application (.3) Researched issue regarding Blocktrace Report and fee application and email to Sonila Themeli (.5)	0.90 362.00/hr	325.80
5/22/2023 SGH		1.00 362.00/hr	362.00
SGH		0.50 362.00/hr	181.00
SSA	Conference call with Receiver Team regarding crypto investigation, sale leaders and other case matters.	1.00 276.00/hr	276.00
5/25/2023 SGH		1.20 362.00/hr	434.40
6/5/2023 SSA	Weekly conference call with Receiver Team	0.60 276.00/hr	165.60
6/6/2023 SGH	Emails with Sonila Themeli regarding pending matters.	0.20 362.00/hr	72.40
SGH	Telephone call from John Lewis regarding pending matters and case administration. Discussed crypto tracing and call with SEC and the pending fee application.	0.40 362.00/hr	144.80
6/12/2023 SGH		0.60 362.00/hr	217.20
SSA	Weekly team meeting.	0.60 276.00/hr	165.60
6/13/2023 SGH	Reviewed email from Receiver regarding call with SEC. Reviewed comments on CFX Crypto report.	0.30 362.00/hr	108.60
6/15/2023 SSA	Conference call with Receivership Team regarding expansion of receivership.	0.70 276.00/hr	193.20
6/16/2023 SGH		0.20 362.00/hr	72.40
6/20/2023 SSA	Weekly call with team.	0.40 276.00/hr	110.40
6/26/2023 SGH	•	0.80 362.00/hr	289.60
SSA	Receiver team. Weekly team meeting on various case issues and strategy.	0.80 276.00/hr	220.80
6/27/2023 SGH		0.20 362.00/hr	72.40
SGH	• •	0.30 362.00/hr	108.60
	Subtotal	20.00	6,483.20

SEC V Cryptor X		J	
		Hrs/Rate	Amount
Cla	ims Administration & Objections		
4/6/2023 SGH	Began considering plan for claims administration for 35,000 investors. Reviewed data we have available and information need on BTC transfers.	0.80 362.00/hr	289.60
	Subtotal	0.80	289.60
Dat	ta Analysis		
4/3/2023 DAB	Reviewed and responded to several emails from Greg Hays and Scott Askue regarding research of investor Bitcoin deposits and CFX contract information. Reviewed Relativity portal for investor information. Initiated schedule of investor emails and contact information. Reviewed email from Sonila Themeli regarding correspondence to investors and research of additional investor information. Researched investor transfers and sales leader Bitcoin accounts.	2.70 170.00/hr	459.00
4/4/2023 SSA	Reviewed production by Rapp and Krock and drafted email to the Receiver regarding same.	0.20 276.00/hr	55.20
4/5/2023 SGH	Researched information regarding Mauricio Chavez from People Bank.	0.50 362.00/hr	181.00
4/6/2023 SGH	Reviewed documents produced by Peoples Trust and note to Scott Askue regarding same.	0.40 362.00/hr	144.80
4/11/2023 DAB	Researched information regarding Bitcoin transaction detail and investor contributions. Reviewed Relativity and Salesforce data for information related to John Fernandez. Researched several documents and spreadsheets for the determination of investor transactions. Discussed issues with Scott Askue regarding investor information and corresponding Bitcoin transactions.	2.30 170.00/hr	391.00
4/14/2023 SSA	Prepared queries and generated report of transactions involving crypto within Salesforce.	3.70 276.00/hr	1,021.20
5/1/2023 SSA	Reviewed documents produced by AMEX	0.50 276.00/hr	138.00
5/12/2023 SSA	Prepared various reports to extract investor data and verify correct based on various investing scenarios and other issues. Prepared reports of same.	2.10 276.00/hr	579.60
	Research regarding Code Red Security Services in Relativity and email to Sonila Themeli and Receiver regarding same. Searched for information on Google Docs.	0.50 362.00/hr	181.00
SSA	Prepared various data merges and reports of investor totals for bonuses, earnings and contract returns. Verified raw data merge against contracts. Prepared summary and detailed reports of same.	6.50 276.00/hr	1,794.00
5/24/2023 SSA	Drafted write up of Salesforce data. Prepared sample reports of same.	1.30 276.00/hr	358.80
5/25/2023 SGH	Reviewed and responded to email from Jillian Harris of the SEC regarding crypto tracing. Email to Scott Askue regarding leader research.	0.30 362.00/hr	108.60
6/9/2023 SGH	Telephone call to John Lewis regarding Blockchain.com and KOT4x (.2). Telephone call to Scott Askue regarding same (.2).	0.40 362.00/hr	144.80

SEC v CryptoFX		Pa	ge 7
		Hrs/Rate	Amount
6/12/2023 SSA	Reviewed and tested SalesForce data to account for earning rolled over into principal. Prepared data query to calculate same.	1.50 276.00/hr	414.00
SSA	Reviewed Salesforce data to account for rolled over principal for what appears to be additional investments.	1.40 276.00/hr	386.40
6/26/2023 SSA	Reviewed and responded to emails regarding imaging of laptop from Mauricio. Chavez.	0.30 276.00/hr	82.80
	Subtotal	24.60	6,440.20
Fee	e / Employment Applications & Objection		
4/28/2023 SSA	Reviewed and edited fee invoice for the first quarter		NO CHARGE
5/5/2023 SGH	2023 for content and consistency of categories. Reviewed draft of fee application.	276.00/hr 0.50 362.00/hr	NO CHARGE
	Subtotal	5.20	0.00
For	ensic Accounting		
4/3/2023 SGH	Research regarding investor payments via BTC and other crypto currency. Prepared analysis of the February 2021 to June 2021 BTC payment of almost \$400,000 (2.5). Drafted email to James Daniels, Kevin Duberstein, Sonila Themeli and Scott Askue regarding the investor payment in BTC and key investors (.8). Reviewed analyses of sale agent accounting for the BTC (.7). Researched Relativity for files on hash tags for BTC (2.0). Drafted additional emails to Blocktrace on searching the investor payments in BTC (1.5) There are over \$800,000 in payments during 2021 that we do not see deposited in CFX accounts. Continued to analyze and research this issue (.5).	8.00 362.00/hr	2,896.00
SGH	Researched jpeg and jpg files for copies of transaction on WhatsApp on BTC transfers. Drafted email to James Daniels on one file located for a \$40K transfer.	1.20 362.00/hr	434.40
DAB	Reviewed several emails from James Daniels and Greg Hays regarding Blocktrace data and HASH search for investor addresses. Continued to review Relativity for leader contracts and revenue reports.	1.60 170.00/hr	272.00
4/5/2023 SGH	Reviewed schedule of additional investors that invested regarding BTC. Formatted data and send email to Sonila Themeli regarding the \$489,000 in additional investors of \$10,000 that we have identified that transferred BTC to CFX. Sonila Themeli is sending emails to these investors to determine where the BTC was transferred.	0.60 362.00/hr	217.20
4/6/2023 SGH	Reviewed issue regarding the nano drive and email regarding same.	0.30 362.00/hr	108.60
4/10/2023 SGH	Corresponded with BlockTrace regarding pending matters.	0.30 362.00/hr	108.60
DAB	Reviewed Relativity for Bitcoin and Coinbase account correspondence and detail with leaders. Reviewed information regarding Ismael Sanchez correspondence with investors. Researched	2.80 170.00/hr	476.00

796.40
796.40
434.40
217.20
,794.00
476.00
398.20
434.40
543.00
434.40
331.20
,122.20

		Hrs/Rate	Amount
4/14/2023 DAB	regarding the investor accounts with Dwaine Butler and email to Sonila Themeli. Reviewed issues for Dwaine Butler to focus on in his review (.4). Reviewed and responded to several emails from Greg Hays and Scott Askue regarding Bitcoin and investor transactions and research. Continued to research Relativity for information regarding John Fernandez and related Bitcoin transactions. Drafted analysis of investor transactions and Wallet identification.	1.80 170.00/hr	306.00
4/17/2023 SGH	Reviewed several emails from Sonila Themeli regarding trace of transaction and investor detail. Reviewed Blocktrace report. Call from James Daniels regarding the report and crypto issues. Call from Shaun Marauder regarding the Blocktrace Report and next steps.	1.20 362.00/hr	434.40
DAB	Researched Relativity for Bitcoin and Coinbase transfer documentation for Receiver's Motion. Reviewed wallet addresses and researched link to	1.80 170.00/hr	306.00
4/18/2023 SGH	leader and investor transfers. Reviewed the Blocktrace report for information regarding Fernandez BTC accounts to determine if CFX transferred BTC or funds to Fernandez (.9). Drafted email to Blocktrace regarding the account and what we have researched regarding Fernandez (.7). Reviewed the WhatsApp log of 35 pages and highlighted the BTC transfers and began preparing an Excel schedule of the transfers. Discussed project with Dwaine Butler to complete the research (.5).	2.10 362.00/hr	760.20
SGH		0.80 362.00/hr	289.60
SGH	Reviewed Blocktrace report of additional accounts to	0.40	144.80
SGH	subpoena. Reviewed the Coinbase account and highlighted accounts for Blocktrace to consider. Continued to review the Blocktrace report.	362.00/hr 1.30 362.00/hr	470.60
SSA	Video conference with BlockTrace regarding report content and research for same. Reviewed report of research crypto addresses. Researched for same. Researched for addresses identified in Defendant records.	2.90 276.00/hr	800.40
DAB	Reviewed and responded to emails from Greg Hays and Scott Askue regarding investor Bitcoin transactions and research of John Fernandez for documentation of account information. Researched Relativity for relative insider information and preparation of Contempt Motion. Reviewed WhatsApp information for determination of leader BTC payments. Reviewed several emails and documents pertaining to Taffinder and Chavez.	2.80 170.00/hr	476.00

SEC v Cryp	toFX		Page	10
			Hrs/Rate	Amount
4/19/2023	SGH	Continued reviewed the Blocktrace report and researching issues on crypto trading. Drafted email to Kevin Duberstein regarding Exhibit 22 and the Net Gain analysis.	1.20 362.00/hr	434.40
	DAB	Discussed issues with Greg Hays regarding Block chain analysis and tracing of Chavez transfers. Reviewed Relativity for information regarding specific wallet addresses and WhatsApp communications.	1.30 170.00/hr	221.00
4/20/2023	SGH	Analysis of the BlockTrace report and profits earned on BTC trades. Prepared analysis of net gain vs total funds raised. Call to James Daniels regarding BTC report and next gain.	1.80 362.00/hr	651.60
	SGH	Traced funds and BTC in the Blocktrace report.	0.50 362.00/hr	181.00
	DAB	Telephone conference call with Blocktrace team and Greg Hays to discuss executive summary of Bitcoin transactions.	0.70 170.00/hr	119.00
	DAB	Researched CFX wallet addresses from Exhibit 22 and updated chart of leader and investor wallet addresses in preparation of Motion to Compel. Continued to review Relativity for information regarding wallet transfers and transactions in connection with defendant Chavez. Reviewed email from Sonila Themeli regarding Hays Affidavit and Receiver's Motion to Compel.	1.80 170.00/hr	306.00
	SSA	Researched for transfers into Mauricio Chavez's bank accounts from Coinbase. Drafted emails to BlockTrace regarding tracing of same to Coinbase accounts.	2.60 276.00/hr	717.60
4/21/2023	SSA	Prepared updated report of Coinbase activity. Reviewed data from Coinbase. Prepared summary report of same. Drafted emails regarding same. Researched for total account balances at certain times for determination of beginning and ending balances.	4.30 276.00/hr	1,186.80
	SGH	Reviewed the Executive Summary prepared by Blocktrace and reviewed report to understand the information (.6) Reviewed analysis prepared by Scott Askue and commented regarding issues in the net gain and total dollar amounts of all transaction (.4). Researched information for three large BTC distributions over \$1.3 million (.4). Drafted email to James Daniels (.2). Organized information from report to include in the Ponzi scheme analysis (.5).	2.10 362.00/hr	760.20
	SGH	Continued researching \$1.3 million in transfers to unknown crypto wallets. Drafted several email to BlockTrace team regarding documents with the crypto addresses.	0.60 362.00/hr	217.20
	DAB	Reviewed high level notes of Crypto activity in preparation of Receiver's Motion. Reviewed and verified specific Crypto wallet addresses against specific investor information and correspondence. Reviewed Greg Hays Affidavit and notarized document. Reviewed revised draft Motion.	2.30 170.00/hr	391.00
4/24/2023	DAB	Reviewed and responded to emails from Greg Hays regarding research of wallet 14Jw, 1Msf, and rHwk in Relativity. Reviewed Relativity for information	2.40 170.00/hr	408.00

		Hrs/Rate	Amount
	regarding transfers or transactions to these wallet addresses and accounts. Continued to review BlockTrace report Coinbase account activity and connection to specific leader information in Relativity.		
4/24/2023 SSA		0.70 276.00/hr	193.20
4/26/2023 SGH		0.60 362.00/hr	217.20
SGH	Considered issue and drafted email to James Daniels regarding crypto report.	0.40 362.00/hr	144.80
DAB	Discussed issues with Greg Hays and Scott Askue regarding summarization of BlockTrace report and identification of four wallet address transfer information. Reviewed Relativity for information related to cf79 and 5fb5.	1.80 170.00/hr	306.00
4/27/2023 SGH		0.70 362.00/hr	253.40
DAB	Video conference call with James Daniels and BlockTrace team regarding executive summary report, preparation of Motion, and analysis of wallet transactions.	0.70 170.00/hr	119.00
DAB	Reviewed several emails from Greg Hays and James Daniels regarding tracing of Coinbase accounts. Reviewed Relativity for information regarding Elite Generators and use of investor funds.	0.80 170.00/hr	136.00
SSA	Analyzed transactions involving Switchain wallets and impact on CryptoFX. Conference call with James Daniels, Kevin Duberstein, Greg Hays and Dwaine Butler regarding the status of the Blocktrace report and other issues.	1.60 276.00/hr	441.60
4/28/2023 SGH		2.50 362.00/hr	905.00
SGH	·	0.40 362.00/hr	144.80
DAB	Reviewed and responded to emails from Greg Hays and James Daniels regarding BlockTrace analysis of various wallet platforms. Researched Chavez non-custodial wallets for the determination of company transactions. Researched documents in Relativity related to the valuation of Chavez non custodial accounts and corresponding detail. Input search of FuBU in Relativity for correspondence and investor/leader communications. Reviewed BlockTrace report for additional detail.	2.80 170.00/hr	476.00
4/29/2023 SGH	•	2.00 362.00/hr	724.00

		Hrs/Rate	Amount
4/29/2023 SGH	Researched Relativity for information on KOT4X, Blockchain.com accounts, account 5f75 where over \$1.0 million was transferred (1.5). Also searched the Kiteworks account for additional information and researched issues for the crypto currency report (.7). Corresponded with James Daniels. Reviewed information regarding the Net Gain and profits analysis. Reviewed information from Coinbase on trades and profits (1.0).	3.20 362.00/hr	1,158.40
4/30/2023 SGH	• • • •	2.30 362.00/hr	832.60
SGH	Corresponded with James Daniels (.3). Updated the status report with additional information and comments from James Daniels of Blocktrace (.6).	0.90 362.00/hr	325.80
5/1/2023 SGH	Reviewed information regarding additional wallets to research and email to James Daniels.	0.20 362.00/hr	72.40
SGH	Updated the Status Report of Crypto currency Trading with comments from Sonila Themeli and Scott Askue. Researched information in the BlockTrace report.	3.00 362.00/hr	1,086.00
SGH	·	2.20 362.00/hr	796.40
5/2/2023 SGH	· · · · · · · · · · · · · · · · · · ·	0.40 362.00/hr	144.80
SGH	Research regarding the 2/5/21 two \$1 million transactions to the KOT4X account from Exodus wallet 1d8g and 3KRj.	0.80 362.00/hr	289.60
SGH	The state of the s	0.70 362.00/hr	253.40
DAB	Researched documentation for wallet address 24f41b5c for transaction detail in Receiver's Motion. Reviewed Relativity for correspondence related to this wallet address. Identified wallet address owner and account information.	2.50 170.00/hr	425.00
SGH		0.80 362.00/hr	289.60
SGH	Additional research on the \$2 million transferred through KOT4X account. Searched the BlockTrace report for information on receipt of funds. Attempted to	0.80 362.00/hr	289.60
5/3/2023 SGH	trace though available documents. Searched Relativity. Telephone call to James Daniels regarding KOT4x and Blockchain.com accounts. Discussed other pending crypto currency investigation issues.	0.40 362.00/hr	144.80

		Hrs/Rate	Amount
5/3/2023 DAB	Reviewed email from Greg Hays and James Daniels regarding additional information to subpoena defendant Chavez. Reviewed wallet addresses 9ed03, 3CSeY9, bef2e54, and 3JUgHa in Relativity for information regarding transactions and wallet ownership. Continued to research Relativity and business emails for communications regarding wallet addresses and specific transaction detail.	2.40 170.00/hr	408.00
5/4/2023 SSA	Researched payments to wallet in the name of Angela Vargas. Drafted email regarding transfers to and from same.	1.50 276.00/hr	414.00
SGH		0.70 362.00/hr	253.40
SGH	Reviewed email regarding Switchain transactions of about \$50,000. Email to Jim Daniels of Blocktrace regarding same.	0.40 362.00/hr	144.80
SGH	Updated draft of crypto currency report.	0.60 362.00/hr	217.20
SSA	Reviewed write up and tracing of activity in Block chain and KOT4X accounts. Drafted email to Greg Hays regarding thoughts and additional information needed.	0.90 276.00/hr	248.40
DAB	Prepared summary of wallet addresses and corresponding wallet owner information. Drafted email to and reviewed email from Greg Hays regarding summary of wallet information and verification of wallet ownership. Continued to research Relativity for information related to wallet 3HXNX, C41101, 3F7usx, and 6C8AA as potential Chavez owned wallets.	2.80 170.00/hr	476.00
DAB	Reviewed BlockTrace report and discussed with Greg Hays.	0.40 170.00/hr	68.00
5/5/2023 DAB	Review in Relativity for transactional detail of wallet cf79. Reviewed BlockTrace summary for transfer detail and to verify exchange platform. Reviewed emails from Jim Daniels and Greg Hays regarding summary of BTC transactions and identification of non custodial wallets.	1.70 170.00/hr	289.00
SGH	Reviewed emails and updated section of the crypto currency report with additional information. Updated the report format and email to James Daniels at Blocktrace regarding the top 10 investigation issues.	0.70 362.00/hr	253.40
5/8/2023 DAB	Researched self custodial wallet accounts in Relativity. Researched relative transactions and communications surrounding specific wallet addresses. Discussed issues with Greg Hays regarding discovery of specific Exodus wallets and communications regarding same.	2.50 170.00/hr	425.00
5/9/2023 DAB	Reviewed emails from Greg Hays and James Daniels regarding BlockTrace summary report and designation of specific non custodial wallet addresses.	2.00 170.00/hr	340.00

		Hrs/Rate	Amount
	Researched Relativity for information related the Chavez Bitcoin accounts and detail related to non custodial accounts.		
5/10/2023 SGH	Research regarding Benvenuto crypto trading. Drafted email to Scott Askue regarding activity in Benvenuto account.	0.50 362.00/hr	181.00
SGH	Edited the draft of the crypto currency report.	0.60 362.00/hr	217.20
DAB	Researched Relativity for specific leader spreadsheets for the determination of transaction detail and Defendant communications. Researched wallet address WcjV for the determination of wallet type and Bitcoin platform.	1.80 170.00/hr	306.00
5/12/2023 SGH		0.80 362.00/hr	289.60
SGH	Research on crypto transactions and emails with Sonila Themeli and James Daniels regarding certain crypto currency accounts and response from Coinbase subpoena. Determine an unknown transfer from Chavez's Exodus wallet account 3R14 for \$263,000 was an alternate wallet deposit address for account and was deposited into 52cd. Several email	1.50 362.00/hr	543.00
5/15/2023 SGH	and time researching accounts to resolve this issue. Zoom conference with James Daniels and Kevin Duberstein regarding pending matters in the forensic investigation.	0.70 362.00/hr	253.40
SGH	Continued to updated the crypto currency tracing report (2.5). Added in priorities for Blocktrace investigation (.8). Researched issues regarding specific transactions. Email to James Daniels regarding issues (.4). Reviewed, updated and	6.40 362.00/hr	2,316.80
SSA	investigated crypto issues (2.7). Telephone conference with James Daniels, Kevin Duberstein and Greg Hays regarding crypto tracing issues and additional information needed. Researched for information on same.	1.40 276.00/hr	386.40
DAB	Researched Exodus wallet in Relativity. Researched wallet addresses IMsfx, bc1Q3, and 1d8g7 known exodus wallets for the determination of Defendant Chavez ownership. Reviewed emails from Greg Hays and James Daniels regarding research efforts and findings.	2.40 170.00/hr	408.00
5/16/2023 SGH	Research, investigate, review and update the crypto currency report. Research specific transactions and explained in the report the primary transaction we are investigating. Discussed the loan account transactions with Scott Askue. Drafted emails to James Daniels regarding the draft report and the Coinbase "Pro" vs "Non-Pro" accounts.	3.80 362.00/hr	1,375.60
DAB	Reviewed Relativity for data and information on leader spreadsheets. Discussed issues with Greg Hays regarding identification of specific wallet addresses and review of BlockTrace summary report. Reviewed report and draft Motion.	1.80 170.00/hr	306.00

		Hrs/Rate	Amount
5/16/2023 DAB	Reviewed and edited Receiver Report. Drafted email to and reviewed email from Greg Hays regarding review of report and editing of same.	0.50 170.00/hr	85.00
SSA		2.40 276.00/hr	662.40
5/17/2023 SGH	• • • • • • • • • • • • • • • • • • • •	0.90 362.00/hr	325.80
SGH		0.60 362.00/hr	217.20
SSA	Reviewed and verified content of Crypto report. Updated and edited as necessary.	4.20 276.00/hr	1,159.20
DAB	Continued to review and edit report. Reviewed BlockTrace summary report draft and discussed transactions with Greg Hays. Reviewed five Coinbase accounts and researched Relativity for details of wallet addresses.	1.70 170.00/hr	289.00
5/18/2023 SGH	Reviewed Blocktrace Net Gain analysis and research regarding crypto report and calculation of Net Gain that is reported to IRS. Discussion with Scott Askue regarding the BlockTrace Net Gain analysis. Reviewed emails regarding this analysis. Drafted email to Sonila Themeli regarding subpoena docs from Coinbase.	0.80 362.00/hr	289.60
SGH	Reviewed and researched crypto issues. Reviewed status of pending subpoenas for Kracken, Bitstamp, Crypto.com and Kucoin. Email to Sonila Themeli regarding same and reviewed response. Updated report with information on these issues. Email to BlockTrace regarding same.	1.50 362.00/hr	543.00
SGH		1.20 362.00/hr	434.40
SSA	Reviewed and verified content of report of crypto analysis to date.	2.60 276.00/hr	717.60
DAB	Reviewed email from Greg Hays regarding subpoena requests for addresses for Kracken, Bitstamp, Crypto.com, and Kucoin wallet addresses. Reviewed Relativity for wallet address detail and documentation for 3JRL, 3Qws, 3J1C, and 3BNW accounts.	2.20 170.00/hr	374.00
5/19/2023 SGH	Research issues for report on missing information and emails regarding BlockTrace. Email to Sonila Themeli regarding issues for motion to compel.	1.30 362.00/hr	470.60
DAB	Discussed issues with Greg Hays regarding BlockTrace report and summary for fourth Receiver report. Reviewed report detail and input wallet research efforts. Reviewed BlockTrace summary chart and report. Continued to review Relativity for specific wallet addresses and transaction detail. Verified subpoena requests and discussed review of wallet address information with Receiver team.	1.40 170.00/hr	238.00
5/22/2023 SGH	Reviewed Blocktrace report and email to Receiver regarding the text portion of the report and tracing cryptos.	0.40 362.00/hr	144.80

		Hrs/Rate	Amount
5/22/2023 DAB	Researched specific wallet addresses in Relativity for communication with leaders and potential transaction detail. Researched Gloria Castanada information for additional leader spreadsheets. Reviewed the Google Drive for custodial wallet address detain and WhatsApp communications.	1.80 170.00/hr	306.00
5/25/2023 DAB	Discussed issues with Greg Hays regarding Relativity research of wallet address identification and corresponding wallet address owners. Reviewed Chavez accounts for transaction detail and communications with leaders. Reviewed Relativity for leader spreadsheets. Identified WhatsApp communications with John Fernandez and Mauricio Chavez. Telephone call from James Daniels regarding BlockTrace executive summary and Bitcoin transaction detail.	2.80 170.00/hr	476.00
SGH	Drafted email to James Daniels of BlockTrace regarding call with SEC and crypto tracing. Call to James Daniels regarding uploading the Blockchain.com, KOT4x and Vargas data into the tracing database. Reviewed budget and sent email to Receiver and Sonila Themeli requesting approval to move forward.	0.60 362.00/hr	217.20
5/30/2023 DAB	Reviewed emails from Jillian Harris and James Daniels regarding the master address list. Reviewed Crypto address list and compared with leader list. Researched Relativity for information regarding specific wallet address detail. Reviewed communications with Mauricio Chavez regarding custodial accounts and transactions of same.	1.80 170.00/hr	306.00
6/1/2023 DAB	Reviewed BlockTrace executive summary and identified specific wallet addresses for additional research in Relativity. Reviewed wallet addresses and leader spreadsheets for the determination of leader transaction activity.	0.80 170.00/hr	136.00
6/5/2023 DAB	Reviewed emails from James Daniels and Greg Hays regarding list of wallet addresses and compilation of total number of addresses. Reviewed BlockTrace wallet address list and compared with Receiver's list. Researched Relativity for information and communication related to four unidentified wallet addresses.	1.80 170.00/hr	306.00
6/12/2023 SGH	Telephone call to from James Daniels regarding call with the SEC on Thursday. Reviewed report. Drafted email to Receiver and Sonila Themeli regarding crypto tracing.	0.40 362.00/hr	144.80
DAB	Reviewed Relativity for information regarding additional wallet addresses and corresponding transactions. Continued to research leader spreadsheets and information regarding Chavez custodial accounts.	0.70 170.00/hr	119.00
6/13/2023 SGH		1.50 362.00/hr	543.00

SEC v Cryp	toFX		Page	17
			Hrs/Rate	Amount
6/13/2023	DAB	Discussed issues with Greg Hays regarding research of leader information and spreadsheets. Updated wallet address database and continued to review Relativity search for additional wallet address and	1.20 170.00/hr	204.00
6/14/2023	SGH	leader detail. Reviewed and edited Power Point for the SEC zoom call on crypto currency. Call to James Daniels.	1.50 362.00/hr	543.00
	SSA	Reviewed crypto analysis presentation.	0.40 276.00/hr	110.40
6/15/2023	DAB	Participated in zoom meeting with the SEC, Receiver team, and BlockTrace regarding potential recovery plan and overview of scope.	1.20 170.00/hr	204.00
	DAB	Researched Relativity for potential defendant information. Reviewed several wallet addresses in search for transactions and leader detail. Reviewed BlockTrace report and searched specific wallet addresses in Relativity portal.	0.80 170.00/hr	136.00
	SGH	Telephone call to James Daniels regarding presentation to SEC (.4). Conference call with Receiver, Sonila, Scott Askue, James Daniels regarding SEC presentation today (1.0).	1.40 362.00/hr	506.80
	SGH	Zoom conference with SEC, Receiver Team and Blocktrace regarding status of crypto currency investigation. Receiver team previewed 40 page Power Point with SEC.	1.00 362.00/hr	362.00
	SGH	Telephone call to James Daniels after the SEC call today regarding crypto tracing.	0.30 362.00/hr	108.60
	SSA	Prepared for and conference call with SEC and Receiver team.	1.60 276.00/hr	441.60
6/19/2023	DAB	Relativity research of leader communications and wallet address information. Continued to search for communications related to transactions.	1.20 170.00/hr	204.00
6/21/2023	SGH	Reviewed pending crypto investigation matters and followed-up with James Daniels on the 18dg Vargas account, fee application, and other issues.	0.30 362.00/hr	108.60
	DAB	Researched Relativity portal for information regarding leader transactions and connection to specific wallet addresses. Searched for specific custodial wallet addresses for determination of transactions. Reviewed BlockTrace report to verity addresses and transfer data.	1.70 170.00/hr	289.00
6/22/2023	DAB	Reviewed wallet address wjcb for determination of leader transaction detail and communications with investors. Researched Relativity for several wallet address searches and detail connected to same.	0.70 170.00/hr	119.00
6/29/2023	SGH		0.20 362.00/hr	72.40
		Subtotal	193.00	53,279.60
	Liti	gation Consulting		
4/19/2023	SGH	Reviewed the draft of the Motion to Compel and drafted email to Sonila Themeli. Began drafting my Affidavit to be Exhibit to the Motion to Compel. Reviewed my prior affidavits in this case and began	2.50 362.00/hr	905.00

		Hrs/Rate	Amount
4/20/2023 SGI	drafting an affidavit. Drafted email to Sonila Themeli and Scott Askue regarding the Affidavit and additional information to include and a chart of the Crypto profits. Telephone call to Sonila Themeli with Scott Askue regarding my affidavit for the Motion for Contempt. Continued to updated my affidavit. Reviewed section of Affidavit drafted by Scott Askue on the houses purchased by Chavez.	1.50 362.00/hr	543.00
SSA	Reviewed and verified content of Motion to Compel.	0.90	248.40
SSA	Drafted email to Sonila Themeli regarding same. A Prepared write up and analysis of transfers for the purchase of Green Haven and Tidmore Lane properties.	276.00/hr 3.60 276.00/hr	993.60
4/21/2023 SSA	Reviewed and edited motion to compel. Drafted email	0.30	82.80
SSA	regarding same. Researched and prepared analysis of funds paid to JM Monarchy.	276.00/hr 0.60 276.00/hr	165.60
SSA	A Drafted email to Sonila Themeli regarding issues and details for Motion to Compel.	0.40 276.00/hr	110.40
4/25/2023 SSA		0.60 276.00/hr	165.60
5/1/2023 SSA		0.20 276.00/hr	55.20
5/2/2023 SSA		4.50 276.00/hr	1,242.00
5/4/2023 SSA	A Prepared various payments reports capturing investments, return of investments, and payment of returns and commissions. Prepared specific reports	2.40 276.00/hr	662.40
5/5/2023 SSA	payments to Gio Benvenuto based on bank account deposits and checks. Prepared spreadsheet of same. Reconciled payments per Salesforce to contracts and	6.20 276.00/hr	1,711.20
5/8/2023 SSA	other information. Prepared supporting payment documents relating to payments to Giorgio Benvenuto. Updated and verified transactions. Researched additional information.	5.10 276.00/hr	1,407.60
5/9/2023 SSA	Continued preparation of supporting payment documents relating to payments to Gio Benvenuto. Updated and verified transactions. Researched	4.00 276.00/hr	1,104.00
5/10/2023 SGI	 additional information. Reviewed analysis prepared by Scott Askue for the Benvenuto settlement. Researched more information on crypto currencies. 	0.60 362.00/hr	217.20
SSA		6.80 276.00/hr	1,876.80
5/11/2023 SSA		7.40 276.00/hr	2,042.40

		Dana	40
SEC v CryptoFX		Page	19
		Hrs/Rate	Amount
5/12/2023 SSA	Finalized analysis of funds received by Giorgio Benvenuto. Drafted email to Sonila Themeli regarding same. Telephone call from same.	0.70 276.00/hr	193.20
SSA	Prepared reports and supporting documents relating to payments to Ebenezer Construction and Gabriel Torres.	4.50 276.00/hr	1,242.00
5/16/2023 SGH	Reviewed the response by Flack on Motion to Compel.	0.40 362.00/hr	144.80
5/23/2023 SGH	Reviewed issues for Response to Motion to Compel and several emails to Sonila Themeli regarding certain crypto addresses of Chavez (.4). Reviewed email form Sonila Themeli and issues regarding sales leaders in Chicago. Researched information obtain in connection with first report and drafted email to Sonila Themeli regarding same (.5).	0.90 362.00/hr	325.80
SSA	Reviewed and verified content of Reply to Motion to Compel. Research regarding same.	0.80 276.00/hr	220.80
5/24/2023 SGH	Reviewed memos on interviews with Cindy Mezomo and Ana Munoz.	0.80 362.00/hr	289.60
6/9/2023 SSA	Updated analysis of vehicles purchased for Angelica Vargas. Researched and compiled contracts where Ms. Vargas received a commission/bonus or direct payment.	3.20 276.00/hr	883.20
6/12/2023 SSA	Prepared summary of payments to and for Angelica Vargas. Organized data supporting same.	2.20 276.00/hr	607.20
6/13/2023 SSA	Finalized report of payments to and for the benefit of Angelica Vargas. Prepared supporting documents and schedules for same. Drafted email to Sonila Themeli regarding same.	3.30 276.00/hr	910.80
6/14/2023 SSA	Drafted email to Greg Hays regarding analysis of crypto transactions in Angelica Vargas' crypto account.	0.30 276.00/hr	82.80
6/15/2023 SSA	Researched for and organized documents relating to transactions with Ebenezer Construction and Torres.	1.30 276.00/hr	358.80
6/23/2023 SSA	Prepared details for demand letter to Angelica Vargas. Drafted email to Jim Daniels regarding payments to Angelica Vargas.	1.40 276.00/hr	386.40
6/27/2023 SSA	Finalized issues for demand letter to Angelica Vargas. Drafted email to Poston Prichett regarding same.	0.40 276.00/hr	110.40
6/29/2023 SSA	Researched, compiled and organized documents for claims against Janette Gonzlez.	2.30 276.00/hr	634.80
6/30/2023 SSA	Continued researching, compiling and organizing documents for claims against Janette Gonzalez.	4.10 276.00/hr	1,131.60
	Subtotal	74.20	21,055.40
Sta	tus Reports		
4/17/2023 SGH	Drafted email to Shaun McGruder regarding the Receiver's next interim report.	0.20 362.00/hr	72.40
4/26/2023 SGH	Reviewed and edited Third Interim Report and drafted email to Sonila Themeli regarding same (.5). Call from Sonila Themeli regarding pending matters including Third Interim Report (.4). Drafted email to Scott Askue regarding issues for the Third Interim Report including Blocktrace, Sale Agents, claims administration, and other issues (.4)	1.30 362.00/hr	470.60

other issues (.4).

SEC v CryptoFX

Page 20

Hrs/Rate Amount

4/27/2023 SGH Reviewed the Blocktrace report and began drafting a summary of all crypto/BTC issues to include in the Receiver's Third Interim Report. Reviewed Blocktrace Executive Summary and edited and added information to explain the analysis that was done and to help

the Receiver's Third Interim Report.

4/28/2023 SGH Continued drafting section of the Receiver's Third Interim Report on crypto currency tracing. Reviewed the Blocktrace Report and added information to Receiver's report. Discussed HFC work with Dwaine Butler and Scott Askue. Researched and updated report.

SGH Updated the section of the Third Interim Report on crypto currency trading (1.0). Drafted language regarding additional key issue and explained the Net Gain analysis (.8). Drafted language regarding the Fernandez account, the Switchain and Binance account (1.2). The entire section is now 9 pages and prepared Exhibits to attach to explain the Receiver's efforts in tracing crypto currency (.9)

justify the expense and effort taken. Considered issues. Research information in prior emails. Updated the language and drafted a five (5) page section for

SGH Drafted email to Sonila Themeli and the Receiver regarding Third Interim Report.

SSA Reviewed status of issues and recoveries. Prepared updated recovery report. Reviewed and edited Third

updated recovery report. Reviewed and edited Third Status Report. Prepared report of receivership receipts and disbursements.

For professional services rendered

Subtotal

3.20 1,158.40 362.00/hr

3.90 1,411.80 362.00/hr

0.40 144.80 362.00/hr

3.40

16.10

276.00/hr

938.40

5,535.80

411.70 \$113,174.00

Additional Charges:

	Amount
Expenses	
4/26/2023 Pacer fees to download docket to post on CFX Website.	19.50
5/1/2023 Pacer on-line charges for downloaded for Receiver's Third Interim Report for posting on Receiver's web site.	9.80
5/16/2023 Pacer charges for Flack's Response to Motion to Compel	1.16
5/23/2023 Pacer on-line charges for Response to Motion to Compel.	0.80
6/28/2023 Pacer charges for first quarter 2023.	82.10
Subtotal	113.36
Total costs	\$113.36
Total amount of this bill	\$113,287.36